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OFFICE OF THE SECRETARY

In the Matter of

2000 Biennial Regulatory Review

Telecommunications Service Quality  
Reporting Requirements

CC Docket No. 00-229

REPLY COMMENTS  
of the  
GENERAL SERVICES ADMINISTRATION

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## **Summary**

GSA responds to requests by the largest incumbent LECs to eliminate or significantly reduce service quality reporting requirements. GSA explains that contrary to claims by these carriers, the reports have not outlived their usefulness.

Numerous comments explain that disaggregated service quality data are vital for consumers to make informed choices among alternative suppliers. Highly aggregated data on the quality of service to millions of users throughout the nation will have minimal value to regulators or consumers.

Many state regulatory agencies report that service quality data is invaluable in performing surveillance functions. These agencies explain that the Commission's reporting program is especially important to them because it provides information in a uniform format, and enables direct comparisons with experiences in other states. Also, interconnected carriers describe their need for information on the services provided by incumbent LECs, which they need to provide consistent levels of service to their own subscribers.

Because of the many benefits of service quality data, GSA recommends that reporting requirements be extended to a few of the larger carriers. GSA concurs with smaller carriers that mandatory service quality reporting requirements are not appropriate for them. However, GSA concurs with a recommendation that reporting requirements be extended to all incumbent LECs that have a significant market presence. For example, administrative burdens could be maintained within reasonable levels and reporting focused where it is most valuable by the specification that a LEC only be required to file information for a state where it provides at least two percent of the access lines.

Based on the comments, GSA recommends that service quality reporting also be extended in several additional ways. For example, service quality reports should be required for competitive LECs that have a fairly large market presence, and reporting requirements should be extended to include broadband services.

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**REPLY COMMENTS  
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GENERAL SERVICES ADMINISTRATION**

The General Services Administration ("GSA") submits these Reply Comments on behalf of the customer interests of all Federal Executive Agencies ("FEAs") in response to the Notice of Proposed Rulemaking in CC Docket No. 00-229 ("Notice") released on November 9, 2000. The Notice seeks comments and replies on issues concerning service quality reporting requirements for local exchange carriers ("LECs").

**I. INTRODUCTION**

The Telecommunications Act requires the Commission to conduct biennial reviews of regulations concerning telecommunications service providers and broadcast ownership in order to evaluate whether competition has made these regulations obsolete or no longer in the public interest.<sup>1</sup> The Notice responds to this mandate by proposing a program to "streamline" procedures for reporting parameters

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<sup>1</sup> Notice, para. 1, citing Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, codified at 47 U.S.C. § 151 *et seq.* ("Telecommunications Act").

on the maintenance and repair of telecommunications equipment and facilities, and associated consumer complaints.

On January 12, 2001, GSA submitted Comments in response to the Notice. In its Comments, GSA explained that some of the proposed changes will eliminate reports containing information that is vital for consumers and regulators.<sup>2</sup> As GSA noted, competition does not diminish the need for timely data on the quality of local exchange services because this data is necessary for consumers to make informed choices among alternative suppliers.<sup>3</sup> Moreover, the presence of competitors provides a potential incentive for carriers to “cut corners” in the quality of their services in order to offer them at lower prices.<sup>4</sup>

GSA also explained that since service quality reporting requirements are mandatory only for the largest LECs that have substantial incomes and healthy earnings ratios, they do not cause an unreasonable financial burden.<sup>5</sup> Indeed, GSA urged the Commission to extend mandatory reporting to encompass more carriers, and also to encourage voluntary reporting by additional incumbent and competitive LECs.<sup>6</sup>

In addition to GSA, more than 30 parties submitted comments in response to the Notice. These parties include:

- 10 incumbent local exchange carriers (“LECs”) and groups of these carriers;
- 10 other carriers and carrier associations;
- 9 state regulatory agencies and public counsels; and

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<sup>2</sup> Comments of GSA, p. 3.

<sup>3</sup> *Id.*, pp. 4–5.

<sup>4</sup> *Id.*, pp. 5–6.

<sup>5</sup> *Id.*, pp. 7–8.

<sup>6</sup> *Id.*, p. 8.

- 2 additional parties.

In these Reply Comments, GSA responds to the positions advanced by those parties.

**II. THE COMMISSION SHOULD REJECT REQUESTS TO ELIMINATE OR DILUTE SERVICE QUALITY REPORTING REQUIREMENTS.**

**A. Incumbent LECs assert that service quality reports have outlived their usefulness.**

At the present time, service quality reporting requirements apply only to the four carriers under mandatory price cap regulation. In their comments, each of these carriers contends that the Commission's reporting requirements are no longer necessary. For example, Verizon asserts that the "reporting requirements have outlived their usefulness and must be eliminated."<sup>7</sup> According to Verizon, this is "a perfect example of the type of obsolete regulation that Congress had in mind" when it enacted the section of Telecommunications Act prescribing biennial reviews.<sup>8</sup>

Similarly, SBC contends that much of the service quality information that currently must be supplied to the Commission is no longer necessary because the market is self-policing.<sup>9</sup> According to SBC, competition is now the driver of service quality, not the Commission's monitoring program.<sup>10</sup>

Along the same lines, BellSouth "applauds the Commission for taking meaningful steps to reduce unnecessary regulation."<sup>11</sup> BellSouth is "particularly

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<sup>7</sup> Comments of Verizon, p. 2.

<sup>8</sup> *Id.*, citing Section 11 of the Telecommunications Act.

<sup>9</sup> Comments of SBC Communications ("SBC"), p. 1.

<sup>10</sup> *Id.*

<sup>11</sup> Comments of BellSouth, p. 1.

encouraged” by the proposal to eliminate the submission on consumer complaints, which this carrier characterizes as “a report which has long outlived its purpose.”<sup>12</sup>

Finally, Qwest asserts that there is no demonstrated “Federal interest” in service quality data.<sup>13</sup> Moreover, even if the “interest” were evident, this would not provide adequate justification for continuing the reporting requirements because the correct interpretation of the law is that a Federal “interest” is not sufficient.<sup>14</sup> According to Qwest, there must be a clear Federal “necessity.”<sup>15</sup>

GSA urges the Commission not to heed the claims of these carriers. The consensus of comments by parties who use the reports is quite different.

**B. With competition starting to build, service quality data is even more important for end users.**

Comments responding to the Notice demonstrate that service quality data is vital for consumers. Indeed, GSA explained in its Comments that uniform procedures providing an independent means for consumers to predict service levels and evaluate carriers’ service claims is particularly important with more competition.<sup>16</sup>

In the first place, data on service quality are vital for consumers to make informed choices among alternative suppliers.<sup>17</sup> Secondly, the presence of competitors provides a potential incentive for carriers to “cut corners” in order to offer their services at lower prices, with the hope that once committed, subscribers will not quickly change their local exchange service provider.<sup>18</sup>

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<sup>12</sup> *Id.*, pp. 1–2.

<sup>13</sup> Comments of Qwest Corporation (“Qwest”), pp. 5–6.

<sup>14</sup> *Id.*, pp. 6–9.

<sup>15</sup> *Id.*

<sup>16</sup> Comments of GSA, p. 4.

<sup>17</sup> *Id.*

<sup>18</sup> *Id.*, pp. 4–5.

In its response to the Notice, AT&T notes that the Commission's data demonstrates that the quality of the LECs' services to end users has declined significantly in recent years.<sup>19</sup> In particular, AT&T observes that the percentage of installation commitments met by the largest LECs for local services to both residence and business customers is now lower than in 1993, and that waiting times for installations for both groups of users increased from 1997 to 1999.<sup>20</sup> In GSA's view, these changes do not provide the backdrop for elimination of service quality reports.

Federal agencies and other large telecommunications users are experienced in procuring telecommunications services in a competitive environment, but they still need service quality information. Although service quality levels are often specified in contracts, business users still must rely on public information concerning the service quality levels actually achieved by carriers. In fact, achieved service levels for carriers operating in a region may be the primary factor in establishing the technical specifications in a request for proposals for carriers to provide telecommunications services. As GSA explained, service level achievements provide an independent means of assessing the likelihood that a carrier will meet the commitments in its proposal.<sup>21</sup>

Comments by the Public Service Commission of Wisconsin ("PSCW") confirm GSA's observations. The Wisconsin regulators state that current telecommunications markets are not yet sufficiently competitive to reduce the level of service quality reporting.<sup>22</sup> The regulators explain:

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<sup>19</sup> Comments of AT&T Corp. ("AT&T"), p. 6.

<sup>20</sup> *Id.*, citing data at <http://www.fcc.gov/ccb/armis/sq/>.

<sup>21</sup> *Id.*, p. 5.

<sup>22</sup> Comments of PSCW, p. 3.



The PSCW believes that monitoring of service quality should remain one of the most important regulatory roles until markets are effectively competitive. Moreover, the availability of service quality information to the public serves important consumer protection functions as we move into an era of multiple service providers and long-term service contracts.<sup>23</sup>

As users depending substantially on contracts for procurement of telecommunications services, GSA concurs with PSCW's observations.

As an additional illustration of the importance of service quality reports to end users, Siemens Medical Solutions Health Services Corporation ("Siemens") states that it requires network services provided by telecommunications carriers to deliver many of its products, applications, and services to organizations throughout the nation.<sup>24</sup> Siemens explains that disclosure of service quality data is necessary so that consumers will be "able to distinguish among service providers and choose a vendor based on service and value."<sup>25</sup> Thus, Siemens urges the Commission to require "regular and rigorous reporting" and recommends that the Commission extend reporting requirements to encompass additional measures for voice services, as well as performance measures for data and broadband services.<sup>26</sup>

**C. State regulators describe the requirements for uniform data on the quality of local telecommunications services.**

State regulatory agencies submitting comments in response to the Notice explain that service quality data is invaluable to them in performing their surveillance functions. For example, the Indiana Utility Regulatory Commission ("IURC") states that it has relied on data and reports provided by the FCC to monitor quality of service.<sup>27</sup>

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<sup>23</sup> *Id.*

<sup>24</sup> Comments of Siemens, p. 1.

<sup>25</sup> *Id.*

<sup>26</sup> *Id.*, pp. 4-8.

<sup>27</sup> Comments of IURC, p. 2.

The IURC explains that the reports and data continue to provide “invaluable support” in service quality proceedings in Indiana.<sup>28</sup> Moreover, in addition to helping maintain surveillance over services in Indiana, the IURC urges continuation of the reports because they allow meaningful comparisons with service quality levels in other states.<sup>29</sup>

Similarly, the Public Utility Commission of Texas (“PUCT”) notes the value of being able to make state-to-state comparisons of telecommunications service quality.<sup>30</sup> The PUCT states that the current reports “provide consistency and nationwide statistics that would be impossible for state regulators to collect independently.”<sup>31</sup> In view of these facts, the PUCT recommends that the Commission continue annual service quality reporting, or even require reports more frequently.<sup>32</sup>

The Wyoming Public Service Commission (“WPSC”) also urges the Commission to continue service quality reporting.<sup>33</sup> Addressing several of the service quality reports that the Commission proposes to eliminate, the WPSC states:

The technical reports on items such as trunk blockage, switch downtime, and network outages are still important to us as regulators, and as the first entity that customers call when they have trouble with their lines.<sup>34</sup>

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<sup>28</sup> *Id.*

<sup>29</sup> *Id.*

<sup>30</sup> Comments of PUCT, p. 2.

<sup>31</sup> *Id.*

<sup>32</sup> *Id.*, p. 6.

<sup>33</sup> Comments of WPSC, p. 5.

<sup>34</sup> *Id.*, p. 3.

In summary, the WPSC states that simplifying the current reporting system will not encourage incumbent providers to maintain their systems or reduce network outages, but simply divert resources from one internal process to another.<sup>35</sup>

**D. Carriers show the need for data on the quality of LECs' interconnection and access services.**

In addition, interconnected carriers describe the need for information on the quality of services provided by incumbent LECs. Indeed, Covad states that the Commission should require incumbent LECs to report performance in serving all of their customers — both retail end user customers and wholesale carrier customers.<sup>36</sup> Covad explains that monitoring the wholesale operations of incumbent LECs is a key step in ensuring the ongoing viability of facilities-based competitors.<sup>37</sup>

AT&T provides statistics showing that periodic reports on the quality of services provided by incumbent LECs to interconnected carriers is especially vital at this time.<sup>38</sup> Specifically, AT&T refers to data on switched and special access services provided to interexchange carriers ("IXCs") by the Regional Bell Operating Companies ("RBOCs").<sup>39</sup> These data show that:

- the percentage of installation commitments met for switched access services, which has declined continuously from 1993 to 1999, is now at a seven-year low;
- the overall performance in meeting special access service commitments has declined more than 10 percent since 1993;
- installation intervals for both switched and special access services are greater than in 1994; and

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<sup>35</sup> *Id.*

<sup>36</sup> Comments of Covad, p. 2.

<sup>37</sup> *Id.*

<sup>38</sup> Comments of AT&T, p. 6.

<sup>39</sup> *Id.*, citing data at <http://www.fcc.gov/ccb/armis/sq/>.

- access service repair intervals have increased by more than 25 percent since 1993.<sup>40</sup>

Interconnected carriers depend upon high-quality services from incumbent LECs to provide high-quality services to their own customers. Reports of deteriorating service levels for access services to IXCs provide additional justification for rejecting contentions by incumbent LECs that service quality reports are no longer necessary.

**III. IN SPITE OF OBJECTIONS, COMPREHENSIVE SERVICE QUALITY REPORTS ARE NOT UNDULY BURDENSOME FOR ANY OF THE CARRIERS NOW UNDER THE COMMISSION'S RULES.**

Service quality reporting requirements apply only to the four incumbent LECs under mandatory price cap regulation. These carriers recommend that the Commission eliminate or sharply curtail service quality reporting obligations because of the "burden" to collect and compile the data. Speaking for these carriers, the United States Telecom Association ("USTA") contends that "quality of service under price cap regulation is not an issue."<sup>41</sup> Indeed, USTA complains that the "administrative burden is only imposed on incumbent LECs."<sup>42</sup> Finally, USTA concludes that the reports should be eliminated.<sup>43</sup>

GSA urges the Commission to place claims of "administrative burden" in perspective. As GSA noted in its Comments, annual revenues for the carriers with mandatory reporting requirements are in the range of \$17 billion to \$58 billion, and these carriers all enjoy earnings level far in excess of the price cap targets.<sup>44</sup> GSA

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<sup>40</sup> *Id.*

<sup>41</sup> Comments of USTA, p. 2.

<sup>42</sup> *Id.* (emphasis provided.)

<sup>43</sup> *Id.*

<sup>44</sup> Comments of GSA, pp. 7-8, citing Federal Communications Commission, *Statistics of Common Carriers*, August 11, 2000, Table 1.1; and *Trends in Telephone Service*, December

submits that comprehensive service quality reporting requirements will not constitute an unreasonable financial burden for these firms.

Comments by other parties also explain that the administrative burdens are minimum. For example, AT&T states:

These requirements do not involve any significant recurring costs for price cap LECs. The systems needed to generate ARMIS data are already established and were funded by captive ratepayers many year ago.<sup>45</sup>

AT&T concludes that any savings from eliminating service quality reports are far outweighed by the benefits of having the data available for interconnected carriers, consumers, state regulators, and other interested parties.<sup>46</sup>

**IV. ON BALANCE, COMMENTS INDICATE THAT REPORTING REQUIREMENTS SHOULD BE EXTENDED TO A FEW MORE CARRIERS.**

**A. Additional incumbent LECs should provide data, but the smallest carriers should be exempt.**

Associations of small incumbent LECs explain that service quality reporting would pose a particularly significant burden on them. For example, the National Telephone Cooperative Association ("NTCA") states it is not necessary or reasonable to gather and publish statistics for more than 1,200 independent telephone companies.<sup>47</sup> The NTCA observes that the community marketplace provides adequate information channels because "through word of mouth, voluntary carrier disclosure, and state commission quality of service reports, rural customers have

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2000, Table 10.1, and Industry Analysis Division, *Interstate Rate-of Return Summary*, April 4, 2000.

<sup>45</sup> Comments of AT&T, p. 10.

<sup>46</sup> *Id.*, p. 1 and p. 10.

<sup>47</sup> Comments of NTCA, p. 4.

sufficient information to make an informed choice.<sup>48</sup> In additional comments, 40 small LECs serving rural areas of 11 states explain that any Federal reporting requirements would be a new burden for which there is no need.<sup>49</sup>

GSA concurs with these smaller carriers that mandatory service quality reporting requirements are not appropriate for them. However, because of the value of service quality data, GSA recommends that the Commission extend mandatory reporting requirements somewhat beyond the present roster of four companies.

As discussed previously in these Comments, the Indiana regulatory agency proclaims the value of service quality reporting. Consequently, the IURC suggests extending mandatory requirements at least to some additional incumbent LECs, with a reporting threshold based on the number of access lines they provide or some other set criteria related to the extent of their market presence.<sup>50</sup> As one alternative, the IURC suggests that service quality reporting be mandatory for all companies that pay into the Commission's Universal Service Fund, and that any other carriers be permitted to file voluntary reports in a similar format as a valuable source of comparative information for the public.<sup>51</sup>

GSA concurs with the IURC that service quality reporting should be extended to additional LECs. A fairly high threshold, such as two percent of the access lines nationwide, would help confine requirements to carriers with adequate resources. Also, administrative burdens could be maintained within reasonable levels and reporting focused where it is most required by a specification that a LEC only be

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<sup>48</sup> *Id.*, p. 3.

<sup>49</sup> Comments of Rural LECs, p. 2.

<sup>50</sup> Comments of IURC, p. 4.

<sup>51</sup> *Id.*

obligated to file information for a state where it provided at least two percent of the access lines.

**B. Larger competitive LECs should also be required to provide service quality data.**

Competitive LECs reject the suggestion that any requirements to submit reports on service quality be extended to them.<sup>52</sup> For example, WorldCom states that there is no evidence that consumers are not satisfied with the quality of the competitive LECs' services, and the costs associated with reporting requirements would unnecessarily burden carriers which are trying to enter local markets.<sup>53</sup>

Another competitive LEC, Focal Communications, notes that incumbent LECs still control a very substantial share of the market at this point in time.<sup>54</sup> This carrier urges the Commission not to impose reporting obligations on competitors because they would place "an additional burden on carriers already experiencing difficulties competing with the incumbent LECs."<sup>55</sup>

GSA concurs with the carriers' observations that incumbent LECs continue to control the local telecommunications markets and that competitors are struggling to extend their market share. However, GSA believes that competitive LECs that have established a significant presence in an area should provide quality of service data. Indeed, these reports may serve as an effective marketing tool where the performance of incumbent LECs has been declining, as reported in the comments by the state regulatory agencies of Indiana, Michigan and Wisconsin.<sup>56</sup> To avoid burdening

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<sup>52</sup> Notice, para. 30.

<sup>53</sup> Comments of WorldCom, p. 1.

<sup>54</sup> Comments of Focal Communications, p. 2.

<sup>55</sup> *Id.*, p. 1.

<sup>56</sup> Comments of IURC, p. 1; Comments of Michigan Public Service Commission, p. 1; and Comments of the Public Service Commission of Wisconsin, p. 3.

competitive LECs with a small market share, GSA suggests that the Commission employ a reporting threshold such as that discussed above for mid-size incumbent LECs. A competitive LEC would only be obligated to file information if it provides two percent of access lines nationwide, and then only for states where it provides at least two percent of the access lines.

State regulators endorse service quality reporting by competitive LECs. Indeed, the Public Service Commission of Wisconsin states, "Service quality information about competitive LECs is of equal or greater importance to their end users."<sup>57</sup> In addition, the Wyoming Public Service Commission states:

Clearly, we do not want competitive providers to be diverted from their primary focus on achieving success in competitive markets . . . . On the other hand, we believe that it is useful, when setting and reviewing service standards, to be able to view the achieved performance of a wide range of local service providers.<sup>58</sup>

In summary, the WPSC concludes that comparative data for all types of providers is an important aspect of service quality reporting requirements.<sup>59</sup>

GSA concurs with the positions enunciated by these regulators and urges the Commission to extend service quality reporting requirements to competitive LECs that have established a significant market presence in a state.

## **V. STATE REGULATORS EXPLAIN THE IMPORTANCE OF DISAGGREGATING SERVICE QUALITY DATA.**

Under the present rules, price cap LECs provide data on installation and repair intervals, as well as service quality complaints, disaggregated between residence and

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<sup>57</sup> Comments of PSCW, p. 4 (emphasis provided.)

<sup>58</sup> Comments of WPSC, p. 4.

<sup>59</sup> *Id.*



business lines.<sup>60</sup> The carriers also furnish separate service quality data for Metropolitan Statistical Areas (“MSAs”) and other areas (“non-MSAs”).<sup>61</sup> The Notice seeks comments on continuation of this reporting detail.<sup>62</sup>

Incumbent LECs contend that service quality reporting has little or no value. They assert that if the monitoring program is to be continued at all, only a few measures should be reported at highly aggregated levels. For example, SBC states that “any new service quality monitoring program must be simple.”<sup>63</sup> Indeed, SBC claims that disaggregation between business and residence lines entails a needless and time-consuming analysis, and the distinction between MSAs and non-MSAs “is meaningless for consumers.”<sup>64</sup>

To the contrary, state commissions explain that disaggregation is vital. For example, the Public Service Commission of Wisconsin (“PSCW”) strongly supports continuing the distinction between business and residence users in the service quality reports.<sup>65</sup> These regulators also support disaggregation of information based on the type of location, because this procedure allows the Commission to assess the effect of different levels of competition on service quality levels.<sup>66</sup>

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<sup>60</sup> Notice, Appendix A, Tables II and V.

<sup>61</sup> *Id.*, Appendix A, Tables II and V.

<sup>62</sup> *Id.*, paras. 27–28.

<sup>63</sup> Comments of SBC, p. 1.

<sup>64</sup> *Id.*, p. 6.

<sup>65</sup> Comments of PSCW, p. 9.

<sup>66</sup> *Id.*

Similarly, the Florida Public Service Commission ("FPSC") explains the importance of targeted data.<sup>67</sup> The FPSC states, "It is easy to demonstrate high quality service performance while performing poorly in small geographic areas."<sup>68</sup>

GSA concurs with the state regulators on this issue. As GSA explained in its Comments, separated data is necessary for the Commission to evaluate a carrier's performance in serving each major group of users.<sup>69</sup> In addition, GSA noted competitive conditions, resource requirements, and the costs of providing telecommunications service may differ significantly between urban and rural areas, and between business and residence users.<sup>70</sup> Highly aggregated data on the quality of a carrier's service to millions of customers in many states will have minimal value to regulators and consumers.

## **VI. COMMENTS DEMONSTRATE THE NEED TO EXTEND SERVICE QUALITY REPORTING TO BROADBAND SERVICES.**

Service quality reports currently address basic local exchange and exchange access services, but the Notice requests comments on the benefits and costs of adding reporting requirements for broadband services.<sup>71</sup> This issue is especially important because the deployment of broadband technologies is a matter of particular interest to the Commission.<sup>72</sup>

Incumbent LECs oppose extension of service quality reporting. For example, USTA states that there is no reason to report service quality for broadband services

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<sup>67</sup> Comments of FPSC, p. 4.

<sup>68</sup> *Id.*

<sup>69</sup> Comments of GSA, p. 9.

<sup>70</sup> *Id.*

<sup>71</sup> Notice, para. 26.

<sup>72</sup> *Id.*, para. 25.

and technologies because “these are highly competitive markets with no dominant provider.”<sup>73</sup>

In its Comments, GSA strongly endorsed extending reports to encompass broadband services because it is important to have reliable and geographically targeted information on wideband telecommunications services in order to implement all of the pro-competitive tools at the Commission’s disposal.<sup>74</sup> Numerous comments support GSA’s position on this issue. For example, the PUCT states that the recent collection of data on the deployment of broadband services was extremely useful, and reporting should be extended to quality measures, particularly because that data will help consumers choose among alternative service providers.<sup>75</sup> Another state regulatory agency, the Public Utilities Commission of Ohio (“PUCO”), also extols the value of service quality data for broadband services.<sup>76</sup> PUCO recommends that service quality data, including data on installation delays longer than 30 days and average repair time intervals, be collected from all broadband providers, using xDSL or its functional equivalent, with more than 5,000 access lines.<sup>77</sup>

In addition, competitive LECs urge the Commission to require service quality reporting for broadband services. The Association for Local Telecommunications Services (“ALTS”) makes the additional point that this data will help regulators evaluate compliance with requirements concerning Operation Support Systems in Section 271 of the Telecommunications Act.<sup>78</sup>

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<sup>73</sup> Comments of USTA, p. 5.

<sup>74</sup> Comments of GSA, p. 10.

<sup>75</sup> Comments of PUCT, pp. 5–6.

<sup>76</sup> Comments of PUCO, pp. 9–10.

<sup>77</sup> *Id.*, p. 10.

<sup>78</sup> Comments of ALTS, p. 11.

GSA concurs with the comments of these parties concerning the need for service quality data on broadband services. Without reliable and uniform data, consumers will be unable to make informed choices among the carriers deploying a complex and potentially confusing array of new technologies to provide broadband services.

## VII. CONCLUSION

As a major user of telecommunications services, GSA urges the Commission to implement the recommendations set forth in these Reply Comments.

Respectfully submitted,

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February 16, 2001

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I, MICHAEL J. ETTNER, do hereby certify that copies of the foregoing "Reply Comments of the General Services Administration" were served this 16th day of February, 2001, by hand delivery or postage paid to the following parties.

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